## **EXHIBIT 9**

## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

V.

FEDERAL INSURANCE COMPANY, an Indiana corporation,

FEDERAL INSURANCE COMPANY'S SECOND SUPPLEMENTAL ANSWERS TO INTERROGATORY NOS. 2, 3, AND 4

Defendant.

To: Plaintiff and its attorneys, Allen Hinderaker and Michael A. Erbele, Merchant & Gould PC, 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendant Federal Insurance Company ("Federal"), for its Second Supplemental

Answers to Plaintiff's First Set of Interrogatories, states and alleges as follows:



U.S. DIST COURT MN
PLAINTIFF EXHIBIT
P-0147A

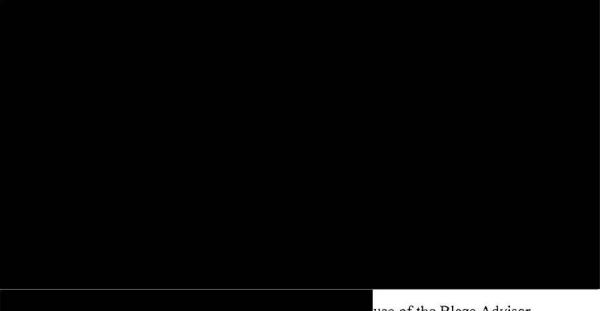
Case No. 16-cv-1054-D S



INTERROGATORY NO. 3: Identify every person, division, or entity, other than employees of the division Chubb & Son of which Federal is aware, that has used the FICO Blaze Advisor® software after June 30, 2006, and:

- State the date of first use and, if applicable, the date of the last use for each person, division, or entity;
- b. Identify all Persons known to you to have knowledge of each such use; and
  - Identify all documents relating to each such disclosure. c.

## SECOND SUPPLEMENTAL ANSWER:



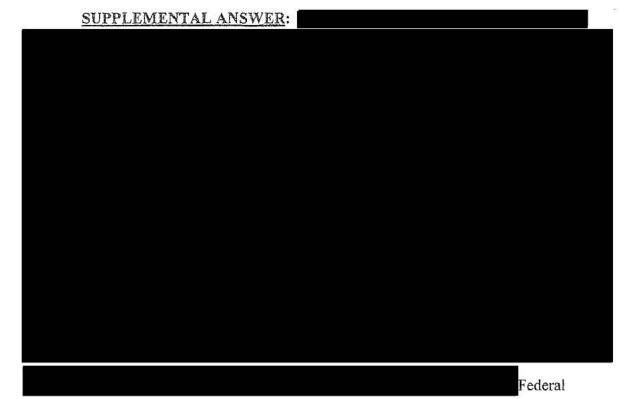
use of the Blaze Advisor

software was made by at least the following: (1) Chubb Insurance Company of Europe SE, (2) Chubb Insurance Company of Canada, including through its relationship with AppCentrica, and (3) Chubb Insurance Company of Australia Limited, including through its Chubb & Son division on or around June 30, 2006 and did so with FICO's knowledge and participation. Information regarding the Blaze Advisor software and accessibility to it were provided on internal Chubb organization shared space. Chubb Insurance Company of Canada has used Blaze Advisor software since at least 2011, and did so with FICO's knowledge and participation. Chubb Insurance Company of Europe SE has used Blaze Advisor software since at least 2010, and did so with FICO's knowledge and participation. Chubb Insurance Company of Europe SE has used Blaze Advisor software since at least 2010, and did so with FICO's knowledge and participation. Chubb Insurance Company of Australia Limited has used Blaze software since at least 2015.

Federal identifies Tamra Pawloski, Henry Mirolyuz, Ewen Setti, Hamish Tonkin, Alexander Pavlenko, Zorica Todorovic, Tony Zhang, Lei Lanz, Dalli Yang, Duff Sorli, Ramesh Pandey, Patrick Sullivan, Benku Thomas, John White, Miranda Chiang, Mark Ruscitto, Dan Tedeschi, Kott Sivakumar, Peter Tribulski, Russell Hodey, David Gibbs, David Rowlands, Peter Davis, Dejan Stojkovic, Ken Kitamura, Ben Pullinger, Martin Sill, Craig Worth, John Fagan, Jeff Pruski, Tanya Filstein, Russell Frost, Charles Nikolas, Diptesh Patel, Oliver Clark (FICO), Michael Sawyer (FICO), Ian Brodie (FICO), and Russell Schreiber (FICO) as persons who may have knowledge regarding use of the Blaze Advisor software.

INTERROGATORY NO. 4: Identify every software application and/or system utilized by Chubb & Son, a division of Federal, or by any division or entity other than Chubb & Son, that utilizes in any way the Blaze Advisor® software, and:

- a. Identify all Persons known to you to have knowledge of each such software application and/or system; and
- b. Identify all documents relating to each such software application and/or system.



identifies the below business units and software applications as having utilized Blaze Advisor software:



Dated: June 21, 2018

s/Terrence J. Fleming
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Attorneys for Defendant

## VERIFICATION

Henry Mirolyuz states under oath that he is a Senior Systems Architect at Chubb Insurance; that he is authorized to respond to Fair Isaac Corporation's Interrogatories on behalf of Federal Insurance Company; that he has relied on directors, employees, agents, and attorneys to provide information used in formulating the answers to interrogatories; and that the answers are true and correct to the best of his knowledge.

Subscribed and sworn to before me

this May of

Notary Public

61909906

SHERRON ROWE-HOHN Notary Public - State of New Jersey My Commission Expires Sep 5, 2021